REMARKS

Favorable reconsideration and allowance of the claims of the present application are respectfully requested.

Before addressing the specific grounds of rejection raised in the present Office Action, applicants have amended Claim 15 to positively recite that the claimed nitride liner is in *contact with the semiconductor substrate*. Support for this amendment to Claim 15 is found throughout the specification of the instant application. See particularly, paragraph [0052], paragraph [0058] and FIGS. 3D, 3E, 4B, 5B, and 5C. In the drawings, reference numeral 68 denotes the nitride liner and reference numeral 50 denotes the semiconductor substrate.

Since the above amendment to Claim 15 does not introduce new matter to the specification of the instant application, entry thereof is respectfully requested.

In the present Office Action, Claims 15-20 stand rejected under 35 U.S.C. § 102(b) as allegedly anticipated by EP 0 967 636 ("EP '636").

Concerning the § 102(b) rejection, it is axiomatic that anticipation under §102 requires that the prior art reference disclose each and every element of the claim to which it is applied. In re King, 801 F.2d, 1324, 1326, 231 USPQ 136, 138 (Fed. Cir. 1996). Thus, there must be no differences between the subject matter of the claim and the disclosure of the prior art reference. Stated another way, the reference must contain within its four corners adequate direction to practice the invention as claimed. The corollary of the rule is equally applicable: Absence from the applied reference of any

claimed element negates anticipation. Kloster Speedsteel AB v. Crucible Inc., 793 F.2d 1565, 1571, 230 USPQ 81, 84 (Fed. Cir. 1986).

Applicants submit that the claims of the present application are not anticipated by the disclosure of EP '636 since the applied reference does not disclose applicants' claimed structure which includes a nitride liner present at least on portions of the sidewalls of a trench which is located in a semiconductor substrate, wherein **the nitride liner is in contact with the semiconductor substrate and protects the sidewalls of the at least one trench so as to reduce stress in the semiconductor substrate.**

EP '636 discloses a method for forming electrically isolated semiconductor devices in a silicon body. In accordance with the process disclosed in EP '636, trenches 20 are formed into a substrate 10. The trenches, as depicted in prior art FIG. 1C, have trench sidewalls 22. A thin layer 24 of silicon dioxide is then formed into the trenches 20 so as to line the trench sidewalls 22. A silicon nitride layer 26 is formed on the silicon dioxide layer 24. See paragraph [0016] and FIG. 1D. Lithography and etching are used to selectively remove portions of the silicon nitride layer 26 from each trench 20, stopping on silicon dioxide layer 24. See paragraphs [0017]-[0018] and FIGS. 1E and 1F.

Applicants respectfully submit that in EP '636 the silicon nitride layer 26 is formed on a layer of silicon dioxide 24 that lines each sidewall 22 of each trench 20. Such a structure including a silicon nitride layer 26 on a silicon dioxide layer 24 located in a trench 22 is different from the claimed structure in which the **nitride liner is in contact with the semiconductor substrate and protects the sidewalls of the at least one trench so as to reduce stress in the semiconductor substrate.** Applicants find no

disclosure in EP '636 which mentions forming the silicon nitride layer 26 in direct contact with the substrate 10. Hence, the claimed structure is not anticipated by the disclosure of EP '636.

The foregoing remarks clearly demonstrate that the applied reference does not teach each and every aspect of the claimed invention, as required by King and Kloster Speedsteel; therefore the claims of the present application are not anticipated by the disclosure of EP '636. Applicants respectfully submit that the instant § 102 rejection has been obviated and withdrawal thereof is respectfully requested.

Thus, in view of the foregoing amendments and remarks, it is firmly believed that the present case is in condition for allowance, which action is earnestly solicited.

Respectfully submitted,

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